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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN KELLY, an individual,  
  
Plaintiff,

v.

WALMART, INC.; DOES I - X, and ROE  
Corporations I - X, inclusive,  
  
Defendants.

CASE NO. 2:20-cv-01129-GMN-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**[THIRD REQUEST]**

Plaintiff KATHRYN KELLY (hereinafter "Plaintiff") and Defendant WALMART INC. (hereinafter "Defendant" or "Walmart"), by and through their respective counsel of record, do hereby stipulate to extend the discovery deadlines in the current scheduling order and discovery plan in this matter for a period of forty-five (45) days for the reasons explained herein.

Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the third such discovery extension requested in this matter.

The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested extension. The parties agree, pending the Court's approval, to extend discovery deadlines, and stipulate that the request is appropriate. Counsel for Plaintiff, Mahna Pourshaban, Esq., has fallen ill with Covid, causing a temporary impairment in her ability to sufficiently proceed in the

prosecution of this matter, as it relates to retention and disclosure of expert witnesses.

The parties have acted in good faith to request this extension and have no intent, nor reason, to delay the resolution of this matter.

**NEW DISCOVERY DEADLINES**

Expert Disclosure Deadline:

Currently: January 15, 2021

Proposed: **March 1, 2021**

Rebuttal Expert Disclosure Deadline:

Currently: February 15, 2021

Proposed: **April 1, 2021**

Discovery Cut-Off Date:

Currently: March 16, 2021

Proposed: ~~April 2, 2021~~ **April 30, 2021**

Dispositive Motion Deadline:

Currently: April 15, 2021

Proposed: **May 28, 2021**

Proposed Joint Pre-Trial Deadline:

Currently: May 13, 2021

Proposed: **June 25, 2021**

All other deadlines dates remain the same.

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1 If this extension is granted, all anticipated additional discovery should be concluded  
2 within the stipulated deadline. This request for extension deadline is made by the parties in good  
3 faith and not for the purpose of delay.

4 DATED this 6<sup>th</sup> day of January, 2021.

DATED this 8<sup>th</sup> day of January, 2021.

5 GINA CORENA & ASSOCIATES

PHILLIPS, SPALLAS & ANGSTADT, LLC

6 */s/ Mahna Pourshaban*

*/s/ Latisha Robinson*

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Attorney for Defendant

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12 **IT IS SO ORDERED; provided, however, that**  
13 **the close of discovery shall be April 30,**  
14 **2021, rather than the April 2, 2021 date**  
15 **stated above.**

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18 **UNITED STATES MAGISTRATE JUDGE**

19 **Dated: January 8, 2021**  
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